

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ME2 PRODUCTIONS, INC.

Plaintiff,

v.

DYLAN BOGERT, *et. al.*,

Defendants.

Case No. C-17-0182RSL

DEFENDANT CLAUDIA FODOR'S
ANSWER

DEMAND FOR JURY

COMES NOW, the defendant Claudia Fodor, and in answer to Plaintiff's *First Amended Complaint for Copyright Infringement*, hereby denies each and every allegation, unless specifically admitted, below.

I. INTRODUCTION

1. Paragraph 1 of Plaintiff's *First Amended Complaint for Damages* does not contain factual averments requiring a response.

II. JURISDICTION AND VENUE

2. Admitted.

3. Admitted.

4. Admitted that venue in this District is proper. Statements alleging that this Defendant, Claudia Fodor, violated Plaintiff's exclusive copyrights in any way are denied.

III. PARTIES

A. Plaintiff and its Copyright

5. Defendant is without knowledge or information sufficient to admit or deny Plaintiff's allegations contained in Paragraph 5 of Plaintiff's *First Amended Complaint for Copyright Infringement*.

6. Defendant is without knowledge or information sufficient to admit or deny Plaintiff's allegations contained in Paragraph 6 of Plaintiff's *First Amended Complaint for Copyright Infringement*.

7. Paragraph 7 contains legal conclusions which do not require a response. Defendant is without knowledge or information sufficient to admit or deny any remaining allegations contained in Paragraph 7 of Plaintiff's *First Amended Complaint for Copyright Infringement*.

8. Defendant is without knowledge or information sufficient to admit or deny Plaintiff's allegations contained in Paragraph 8 of Plaintiff's *First Amended Complaint for Copyright Infringement*.

9. Paragraph 9 contains legal conclusions which do not require a response. Defendant is without knowledge or information sufficient to admit or deny any remaining allegations contained in Paragraph 9 of Plaintiff's *First Amended Complaint for Copyright Infringement*.

B. Defendants

10. Defendant is without knowledge or information sufficient to admit or deny Plaintiff's allegations contained in Paragraph 10 of Plaintiff's *First Amended Complaint for Copyright Infringement*.

11. Defendant is without knowledge or information sufficient to admit or deny Plaintiff's allegations contained in Paragraph 11 of Plaintiff's *First Amended Complaint for Copyright Infringement*.

1 12. Defendant is without knowledge or information sufficient to admit or deny
2 Plaintiff's allegations contained in Paragraph 12 of Plaintiff's *First Amended Complaint for*
3 *Copyright Infringement*.

4 13. Defendant is without knowledge or information sufficient to admit or deny
5 Plaintiff's allegations contained in Paragraph 13 of Plaintiff's *First Amended Complaint for*
6 *Copyright Infringement*.

7 14. Defendant is without knowledge or information sufficient to admit or deny
8 Plaintiff's allegations contained in Paragraph 14 of Plaintiff's *First Amended Complaint for*
9 *Copyright Infringement*.

10 15. Defendant is without knowledge or information sufficient to admit or deny
11 Plaintiff's allegations contained in Paragraph 15 of Plaintiff's *First Amended Complaint for*
12 *Copyright Infringement*.

13 16. Defendant is without knowledge or information sufficient to admit or deny
14 Plaintiff's allegations contained in Paragraph 16 of Plaintiff's *First Amended Complaint for*
15 *Copyright Infringement*.

16 17-29. Paragraphs 17-29 are allegations or assertions by Plaintiff related to which IP
17 addresses allegedly belong to which named defendant in this case. Defendant is without
18 knowledge or information sufficient to admit or deny Plaintiff's allegations as to all of these
19 defendants. In particular, this Defendant, referenced in Paragraph 23, does not currently know
20 her IP address.

21 **IV. PEER-TO-PEER NETWORKS AND THE BITTORRENT PROTOCOL**

22 30. Defendant is without knowledge or information sufficient to admit or deny
23 Plaintiff's allegations contained in Paragraph 30 of Plaintiff's *First Amended Complaint for*
24 *Copyright Infringement*.

1 31. Defendant is without knowledge or information sufficient to admit or deny
2 Plaintiff's allegations contained in Paragraph 31 of Plaintiff's *First Amended Complaint for*
3 *Copyright Infringement*.

4 32. Defendant denies all allegations contained in paragraph 32.

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6 **V. COMPUTER FORENSIC IDENTIFICATION OF BITTORRENT**
7 **INFRINGEMENT**

8 33. Defendant is without knowledge or information sufficient to admit or deny
9 Plaintiff's allegations contained in Paragraph 33 of Plaintiff's *First Amended Complaint for*
10 *Copyright Infringement*.

11 34. Defendant is without knowledge or information sufficient to admit or deny
12 Plaintiff's allegations contained in Paragraph 34 of Plaintiff's *First Amended Complaint for*
13 *Copyright Infringement*.

14 35. Defendant is without knowledge or information sufficient to admit or deny
15 Plaintiff's allegations contained in Paragraph 35 of Plaintiff's *First Amended Complaint for*
16 *Copyright Infringement*.

17 **VI. JOINDER**

18 36. Defendant is without knowledge or information sufficient to admit or deny
19 Plaintiff's allegations contained in Paragraph 36 of Plaintiff's *First Amended Complaint for*
20 *Copyright Infringement*.

21 37. Defendant is without knowledge or information sufficient to admit or deny
22 Plaintiff's allegations contained in Paragraph 37 of Plaintiff's *First Amended Complaint for*
23 *Copyright Infringement*.

24 38. Defendant is without knowledge or information sufficient to admit or deny
25 Plaintiff's allegations contained in Paragraph 38 of Plaintiff's *First Amended Complaint for*
Copyright Infringement.

1 39. Defendant is without knowledge or information sufficient to admit or deny
2 Plaintiff's allegations contained in Paragraph 39 of Plaintiff's *First Amended Complaint for*
3 *Copyright Infringement*.

4 40. Defendant is without knowledge or information sufficient to admit or deny
5 Plaintiff's allegations contained in Paragraph 40 of Plaintiff's *First Amended Complaint for*
6 *Copyright Infringement*.

7 41. Defendant is without knowledge or information sufficient to admit or deny
8 Plaintiff's allegations contained in Paragraph 41 of Plaintiff's *First Amended Complaint for*
9 *Copyright Infringement*.

10 42. Defendant is without knowledge or information sufficient to admit or deny
11 Plaintiff's allegations contained in Paragraph 42 of Plaintiff's *First Amended Complaint for*
12 *Copyright Infringement*.

13 **VII. CAUSE OF ACTION – COPYRIGHT INFRINGEMENT**

14 43. Paragraph 43 of Plaintiff's complaint does not required a response.

15 44. Defendant is without knowledge or information sufficient to admit or deny
16 Plaintiff's allegations contained in Paragraph 44 of Plaintiff's *First Amended Complaint for*
17 *Copyright Infringement*.

18 45. Defendant is without knowledge or information sufficient to admit or deny
19 Plaintiff's allegations contained in Paragraph 45 of Plaintiff's *First Amended Complaint for*
20 *Copyright Infringement*.

21 46. Defendant Claudia Fodor denies the statements and averments contained in
22 Paragraph 46 of Plaintiff's *First Amended Complaint for Copyright Infringement*, as they purport
23 to pertain to her, and not to other defendants.

24 47. Defendant Claudia Fodor denies the statements and averments contained in
25 Paragraph 47 of Plaintiff's *First Amended Complaint for Copyright Infringement*, as they purport
to pertain to her, and not to other defendants.

1 48. Defendant Claudia Fodor denies the statements and averments contained in
2 Paragraph 48 of Plaintiff's *First Amended Complaint for Copyright Infringement*, as they purport
3 to pertain to her, and not to other defendants.

4 49. Defendant Claudia Fodor denies the statements and averments contained in
5 Paragraph 49 of Plaintiff's *First Amended Complaint for Copyright Infringement*, as they purport
6 to pertain to her, and not to other defendants.

7 50. Paragraph 50 of Plaintiff's *First Amended Complaint for Copyright Infringement*,
8 is a request for relief, and does not require a response.

9 51. Paragraph 51 of Plaintiff's *First Amended Complaint for Copyright Infringement*,
10 is a request for relief, and does not require a response.

11 52. Defendant Claudia Fodor denies the statements and averments contained in
12 Paragraph 52 of Plaintiff's *First Amended Complaint for Copyright Infringement*, as they purport
13 to pertain to her, and not to other defendants.

14 53. Paragraph 51 of Plaintiff's *First Amended Complaint for Copyright Infringement*,
15 is a request for relief, and does not require a response.

16 **VIII. PRAYER FOR RELIEF**

17 Defendant Claudia Fodor denies Plaintiff is entitled to damages from her, as sought in
18 this paragraph.

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21 GEHRKE, BAKER, DOULL & KELLY, PLLC

22 /s/ Michael J. Kelly
23 Michael J. Kelly WSBA #31816
24 Attorney for Defendant Claudia Fodor
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